

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

OLD REPUBLIC TITLE, LTD.,

Plaintiff,

v.

TROY X. KELLEY and DIANE
DUFFRIN KELLEY, individually and as
a marital community,

Defendants.

No. 10-cv-0038-JLR

**DECLARATION OF JANET FRETS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

**NOTE ON MOTION CALENDAR:
FEBRUARY 11, 2011**

ORAL ARGUMENT REQUESTED

I, Janet C. Frets (formerly Janet C. Summers), declare as follows:

1. I make this declaration based upon personal knowledge of the matters stated herein. I am over the age 18 and am competent to testify.

2. I am a Quality Assurance Department Officer for Old Republic Title, Ltd. ("Old Republic") in Washington. My responsibilities as a Quality Assurance Department Officer include supervision and oversight of Old Republic's Quality Assurance Department. I have held this position since 2000.

3. On March 26, 2007, Jason JeRue sent me an email regarding the Post Closing Department's fee schedule. Attached as Exhibit A is a true and correct copy of the email I received from Jason JeRue.

FRETS DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY JUDGMENT - (No. 10-cv-0038-JLR) - 1
4819-3067-3672.01
012011/1008/62131.00047

Riddell Williams P.S.
1001 FOURTH AVENUE
SUITE 4500
SEATTLE, WA 98154-1192
206.624.3600

1 I declare under penalty of perjury under the laws of the State of
2 Washington that the foregoing is true and correct.

3 EXECUTED this 20th day of January, 2011 at Lynnwood Washington.
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6 Janet Frets
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CERTIFICATE OF SERVICE

I, Melodi Downs, states as follows:

I am over 18 years of age and a citizen of the United States. I am employed as an executive assistant by the law firm of Riddell Williams P.S.

On the date noted below I electronically filed the foregoing document titled **DECLARATION OF JANET FRETS IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** using the CM/ECF system and caused to be delivered true and accurate copies of the same via the CM/ECF system which will send notification of such filing to:

Judy A. Endejan, WSBA #11016
David C. Lundsgaard, WSBA #25448
GRAHAM & DUNN PC
Pier 70 – 2801 Alaskan Way, Ste. 300
Seattle, WA 98121-1128
Email: jendejan@grahamdunn.com
dlundsgaard@grahamdunn.com

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this Certificate of Service was executed on this 20th day of January, 2011, at Seattle, Washington.



Melodi Downs

Exhibit A

-----Original Message-----

From: Jason JeRue [mailto:jjerue@propertydose.com]

Sent: Monday, March 26, 2007 4:47 PM

To: Janet Summers

Subject: Re: fee schedule

Janet,

The fee is \$20 flat for each item (each DOT to be tracked). Your EO's are already filling out our one-page cover sheet which includes all the pertinent information necessary to track each reconveyance, some of which are:

- Escrow #
- Escrow officer
- DOT #
- Seller's name
- Property address (if refi)/seller's forwarding address if sale

We haven't had a problem with any office not submitting these forms along with the check. The forms are simple and pretty straight-forward, so we have been getting all the information we need (with few exceptions).

Take care.

Janet Summers <JSummers@ortc.com> wrote:

Do you have a fee schedule and requirements of what you require to accompany the check issued to you. Would you email to me so I can forward it to our corporate office?



Janet C. Summers 4114 198th Street SW, Suite 4 T 425-776-1970
Quality Assurance Department Lynnwood, WA 98036 F 425-776-2910